

EXHIBIT 12

Samantha Wolff

From: Samantha Wolff
Sent: Friday, April 14, 2017 2:55 PM
To: 'pau@bremerwhyte.com'; 'Lital Ruimy (lruimy@bremerwhyte.com)'; 'ahurley@bremerwhyte.com'; 'tbacon@bremerwhyte.com'
Cc: Kurt A. Franklin; 'Victor Otten'; Ambra S. Jackson; Ann D. Ghiorso
Subject: RE: Lunada Bay - Discovery follow-up
Attachments: 2017-02-01 PLTF D. Reed Roggs to DEF. Frank Ferrara, Set One.pdf; 2017-01-13 PLTF Cory Spencer_s First Set of ROGS to DEFT Charlie Ferrara....pdf; 2017-01-13 PLTF Cory Spencer_s First Set of ROGS to DEFT Frank Ferrara.pdf

Dear counsel,

Please provide your availability for a call with the Magistrate next week. I never received a response to my email below, and more importantly, we never received any responses to the below-referenced interrogatories.

Additionally, several months ago I asked Ms. Bell to let me know whether your clients would be providing copies of their phone bills and text messages in accordance with our November 11, 2016 discovery request. Although your clients stated that they do not possess any documents in response to these requests, not only do they have access to their phone bills (and are thus obligated to produce them), but they also have communicated with co-defendants in this matter (as demonstrated in Sang Lee's privilege log which references text messages between these co-defendants). These communications must be produced, and we will therefore also seek the Magistrate's assistance in this regard.

Thank you.

Sincerely,
Samantha

From: Samantha Wolff
Sent: Tuesday, March 21, 2017 3:37 PM
To: 'pau@bremerwhyte.com' <pau@bremerwhyte.com>; Eileen Gaisford (egaisford@bremerwhyte.com) <egaisford@bremerwhyte.com>; Lital Ruimy (lruimy@bremerwhyte.com) <lruimy@bremerwhyte.com>
Cc: Kurt A. Franklin <kfranklin@hansonbridgett.com>; Victor Otten <vic@ottenlawpc.com>; Ambra S. Jackson <AJackson@hansonbridgett.com>; Ann D. Ghiorso <aghiorso@hansonbridgett.com>
Subject: Lunada Bay - Discovery follow-up

Dear Eileen,

I'm writing regarding Plaintiff Spencer's first set of interrogatories to Defendants Charlie and Frank Ferrara (consisting of one interrogatory to each defendant) served January 13, 2017, and Plaintiff Reed's first set of interrogatories to Defendant Frank Ferrara (consisting of 18 interrogatories) served February 1, 2017. We received no responses to any of these discovery requests, and certainly Defendants' opportunity to assert objections is now waived. Please provide responses to these interrogatories by Friday, March 24th. If your clients fail to do so, we will seek relief from the court.

Thank you for your anticipated cooperation.

Sincerely,
Samantha

Samantha Wolff
Partner

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